

AROC



Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

November 16, 2000

Mr. Wayne Pierre, Team Leader
Environmental Cleanup Office
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Dean Nygard, Site Remediation Manager
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

SUBJECT: Request to Extend the Enforceable Milestone for the Operable Unit 1-07B Draft Record of Decision Amendment (EM-ER-219)

Dear Mr. Pierre and Mr. Nygard:

The Environmental Protection Agency, the Department of Environmental Quality, and the U.S. Department of Energy, Idaho Operations Office completed comment resolution and reached informal concurrence on the Operable Unit (OU) 1-07B Proposed Plan on November 8, 2000. This concurrence is approximately three months behind the baseline schedule. The cause for this delay is related to an agency concern over compliance with state Underground Injection Control regulations and the possibility of reinjecting radionuclides from the New Pump and Treat Facility in concentrations above MCLs. The issue was resolved after three months of discussion, but the resulting three-month delay has impacted the INEEL's ability to prepare the draft Record of Decision (ROD) Amendment before the enforceable date of February 2001.

Per the Federal Facilities Agreement and Consent Order (FFA/CO) Section 13, Part 1, DOE is requesting that the enforceable milestone for submitting the OU 1-07B draft ROD Amendment for agency review be extended from February 2001 to May 2001. DOE believes it has "good cause" for requesting the extension because the agencies required an additional three months to resolve the issue, and the additional three months was outside the control of DOE. Extending the ROD Amendment enforceable submittal date does not affect other OU 1-07B enforceable milestones.

Pierre, Nygard

-2-

Per section 13.4 of the FFA/CO, the agencies have seven days to respond to this extension request. We appreciate your attention to this matter and look forward to your favorable response. If you have any questions regarding this issue please contact Mark Shaw at (208) 526-6442.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen E. Hain".

Kathleen E. Hain, Manager
Environmental Restoration Program

cc: M. Jeffers, DEQ, 1410 N. Hilton, Boise, ID 83706